

**IN THE DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Students for Life of America, *et al.*,

Plaintiffs,

v.

Ann Gillespie, Acting Director of the Illinois
Department of Insurance,

Defendant.

Case No. 1:24-cv-11928
District Judge Jeffrey I. Cummings
Magistrate Judge Beth W. Jantz

**DEFENDANT’S UNOPPOSED FIRST MOTION FOR EXTENSION OF TIME AND
BRIEFING SCHEDULE FOR MOTION TO DISMISS PLAINTIFFS’ SECOND
AMENDED COMPLAINT**

Defendant Acting Director of the Illinois Department of Insurance Ann Gillespie, pursuant to Federal Rule of Civil Procedure 6(b), respectfully requests an unopposed extension of time, up to and including March 31, 2025, to respond to Plaintiffs’ Second Amended Complaint. This is Defendant’s first motion for an extension of time to respond to the Second Amended Complaint. Defendant also requests that the Court enter a briefing schedule ordering Plaintiffs’ response to the motion to dismiss due on May 5 and Defendant’s reply due on May 19. In support of this motion, Defendant states as follows:

1. On February 3, 2025, Defendant moved to dismiss Plaintiffs’ initial Complaint. Dkt. 15, 16.

2. In lieu of responding to Defendant’s motion to dismiss, Plaintiffs filed their Second Amended Complaint¹ on February 27. Dkt. 19. They challenge two provisions of the

¹ Plaintiffs filed a First Amendment Complaint on February 24, Dkt. 18, then filed a Second

Illinois Insurance Code enacted through the Reproductive Health Act, 215 ILCS 5/356z.4a and 5/356z.60.

3. The Second Amended Complaint brings six claims, including one new claim, and adds a new Plaintiff. It is 50 pages longer than the initial Complaint. It seeks a declaratory judgment as well as various types of injunctive relief.

4. Pursuant to the Court's standing order, Defendant has 21 days to respond to the Second Amended Complaint.

5. Defendant's counsel have been diligently working on this matter; however, due to the myriad complex and novel issues and arguments raised in this lawsuit, as well as the need for supervisory and client review, Defendant requires additional time to respond.

6. Defendant therefore respectfully requests an extension of time to respond to the Second Amended Complaint, up to and including March 31, 2025.

7. This is Defendant's first request for an extension of time to respond to the Second Amended Complaint.

8. Plaintiffs do not object to the requested extension of time.

9. Additionally, Defendant's counsel and Plaintiffs' counsel conferred, and agree upon the following briefing schedule for Defendant's motion to dismiss the Second Amended Complaint:

- a. Plaintiffs' response due May 5; and
- b. Defendant's reply due May 19.

Amended Complaint to correct technical errors. Dkt. 19. The Second Amended Complaint is the operative pleading.

CONCLUSION

Accordingly, Defendant respectfully requests that the Court enter an Order extending the time to respond to Plaintiffs' Second Amended Complaint, up to and including March 31, 2025, and ordering Plaintiffs' response due on May 5 and Defendant's reply due on May 19.

Dated: March 3, 2025

Respectfully submitted,

KWAME RAOUL
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